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*Counsel for Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

JEFFREY MOLNAR, WESLEY  
THORNTON, AILEEN MARTINEZ,  
CHIQUITA BELL, TEYIA BOLDEN, and  
ANTOINETTE STANSBERRY,  
individually and on behalf of all others  
similarly situated,

*Plaintiffs,*

v.

NCO FINANCIAL SYSTEMS, INC., a  
Pennsylvania Corporation,

*Defendant.*

Case No. 3:13-cv-00131-BAS-JLB

**STATUS REPORT REGARDING  
ONGOING SETTLEMENT  
NEGOTIATIONS**

Judge: Hon. Cynthia A. Bashant  
Magistrate: Hon. Jill L. Burkhardt

Courtroom: 4B

1 Plaintiffs Wesley Thornton, Aileen Martinez, Chiquita Bell, Teyia Bolden, and  
 2 Antoinette Stansberry (collectively “Plaintiffs”), jointly with Defendant NCO Financial  
 3 Systems, Inc., (collectively “the Parties”) by and through their undersigned counsel,  
 4 respectfully provide the Court with the following status report regarding their August  
 5 24, 2015 mediation and their ongoing settlement efforts, pursuant to this Court’s order  
 6 dated August 19, 2015 (ECF No. 196).

7 On August 24, 2015, the Parties participated in an all-day private mediation  
 8 before the Honorable Morton Denlow of JAMS (Chicago). Although the Parties did  
 9 not reach a settlement that day, with the assistance of Judge Denlow, they made  
 10 substantial progress toward the resolution of this action. At the close of the day, the  
 11 Parties further agreed to continue their discussions, hopeful that they would build upon  
 12 the progress made during the mediation session. At this time, the Parties remain  
 13 engaged in settlement discussions and are cautiously optimistic that a settlement is  
 14 possible and that they will be able to reach an agreement on principal terms of such a  
 15 resolution (or determine that they will be unable to do so) within thirty (30) days.

16 In light of the foregoing, and pursuant to this Court’s August 19, 2015 (ECF No.  
 17 196), the Parties propose the following schedule of revised dates and deadlines for  
 18 completion of the pertinent pre-trial requirements:

- 19 a. Pretrial disclosure requirements of Fed. R. Civ. P. 26(a)(3) by  
 20 **November 13, 2015;**
- 21 b. Local Rule 16.1.f.4.a actions by **November 6, 2015;**
- 22 c. Local Rule 16.1.f.6.a actions by **November 13, 2015;**
- 23 d. Objections to Fed. R. Civ. P. 26(a)(3) disclosures by **November 13,**  
 24 **2015;**
- 25 e. Proposed pretrial order in the form prescribed by Local Rule  
 26 16.1.f.6.c by **November 20, 2015;**
- 27 f. Final pretrial conference before the Honorable Cynthia Bashant on  
 28 Monday, **December 7, 2015;**

- g. All motions *in limine* by **December 21, 2015**;
- h. All responses to motions *in limine* by **January 8, 2016**;
- i. Joint proposed jury instructions, proposed verdict form, *voir dire* instructions, and statement of the case by **January 8, 2016**;
- j. Exchange of final exhibit and witness lists by **January February 1, 2016**;
- k. Hearing on motions *in limine* on **January 29, 2016 at 10:30 a.m.**;
- l. Trial on Tuesday, **February 9, 2016 at 9:00 a.m.**

The Parties respectfully submit that the above revised case schedule will permit them the time necessary to determine whether a settlement can be reached and if not, will not needlessly delay the efficient progression of the litigation. Should the Parties ultimately reach an agreement on the principal terms of a settlement prior to any of the aforementioned dates, however, they will promptly file a further status report informing the Court of the same and proposing a schedule for presentation of the proposed settlement to the Court.

Respectfully Submitted,

**JEFFREY MOLNAR, WESLEY THORNTON, AILEEN MARTINEZ, CHIQUITA BELL, TEYIA BOLDEN, and ANTOINETTE STANSBERRY**, individually and on behalf of all others similarly situated,

DATED: September 8, 2015

By: s/ J. Dominick Larry

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*Attorneys for Plaintiffs and the Proposed Class*

DATED: September 8, 2015

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Michael D. Slodov (*pro hac vice*)  
**SESSIONS FISHMAN, NATHAN & ISRAEL, L.L.C.**  
*Attorney for Defendant*

**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained its approval for his electronic signature to this document.

DATED: September 8, 2015

By: s/ J. Dominick Larry